

# **EXHIBIT A**

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN,  
  
Defendants.

Case No.: 3:18-cr-00577-CRB  
Judge: Hon. Charles Breyer

**DECLARATION OF DAVID TINDLE IN  
SUPPORT OF MOTION TO MODIFY  
CONDITIONS OF PRETRIAL RELEASE**

1 I, David Tindle declare as follows:

2 1. I am the Global Operations Manager at Keelson Strategic Corporation  
3 (“Keelson”), the private security firm that is providing 24-hour armed security to oversee Dr.  
4 Lynch’s compliance with the conditions imposed by the Court and Pretrial Services.

5 2. I have three decades of experience in the private security industry. Prior to that, I  
6 spent 12 years in the Parachute Regiment of the British Army.

7 3. I am responsible for day to day management of the security team that is  
8 overseeing Dr. Lynch’s compliance with the Court’s release conditions, am in daily contact with  
9 the officers who are supervising Dr. Lynch and in at least weekly contact with Kim Do of  
10 Pretrial Services.

11 4. Since Keelson began supervising Dr. Lynch in May 2023, Dr. Lynch has been  
12 fully compliant with all terms and conditions of his release, including confinement to his home in  
13 San Francisco and obtaining pre-approval from U.S. Pretrial Services for all approved  
14 movements.

15 5. Since Keelson Strategic began supervising Dr. Lynch in May 2023, there has not  
16 been a single violation of his conditions nor any cause for concern. Dr. Lynch has been a model  
17 supervisee.

18 6. On several occasions, the Court has temporarily modified Dr. Lynch’s bond  
19 conditions to permit him to leave his residence from 9:00 am to 9:00 pm. On each of those  
20 occasions, Dr. Lynch has been fully compliant with the modified conditions, never once being  
21 late or causing any issue. Those temporary modification periods covered the following dates:

22 a. July 10-17, 2023

23 b. Aug. 9-26, 2023

24 c. Sept. 24 – Oct. 9, 2023

25 d. Oct. 24 – Nov. 5, 2023

